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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff;

vs.

GREGORY J. OLSON,

Defendant.

CASE NO.: 2:12-cr-00327-APG-VCF

**STIPULATION AND PROPOSED
ORDER TO CONTINUE SENTENCING**

Gregory Olson, by and through his counsel of record, Kathleen Bliss, Esq., and Jason Hicks, Esq., of the law firm Kathleen Bliss Law PLLC; and the United States of America, by and through Assistant United States Attorney Daniel Cowhig, hereby stipulate and request that the Court vacate Mr. Olson's sentencing hearing currently set for August 18, 2016, and continue it to a later time convenient to the Court, but not less than thirty (30) days from the current setting. This stipulation is made and based upon the following:

1. On May 9, 2016, Mr. Olson entered a plea of guilty to the Indictment charging him with one count of wire fraud in violation of 18 U.S.C. § 1343, and four counts of income tax evasion in violation of 26 U.S.C. § 7206(1). ECF Nos. 126, 127. The Court set Mr. Olson's sentencing hearing for August 18, 2016.
2. Mr. Olson is at liberty pending sentencing.
3. Counsel for Mr. Olson believes there are numerous sentencing issues that must be

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considered by this Court. Mr. Olson will be filing a sentencing memorandum, however requests additional time to research and prepare said memorandum.

4. The additional time requested by this stipulation is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed [for sentencing] in this rule."
5. This is the first request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay.
6. Denial of this request for a continuance would deny counsel for Mr. Olson sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

Dated this 8th day of August 2016.

/s/ Daniel Cowhig
 DANIEL COWHIG
 Counsel for the United States

Kathleen Bliss
 KATHLEEN BLISS
 Counsel for Gregory Olson

ORDER

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Mr. Olson's sentencing hearing currently set for August 18, 2016, be, and the same hereby is, VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for October 6, 2016, at the time of 9:30 a.m. in courtroom 6C.

DATED: August 9, 2016


 THE HONORABLE ANDREW P. GORDON
 UNITED STATES DISTRICT JUDGE